

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

ORIENTAL BANK
PLAINTIFF.

V.

PENTZKE LEMUS, ET AL.
DEFENDANTS.

CIVIL CASE No.: 24-01550 (MAJ)

MOTION FOR JOINDER OF MOTION TO DISMISS

TO THE HONORABLE COURT:

COMES NOW, codefendant Stefania Vélez Echevarría (hereinafter, “Ms. Vélez” or “Defendant”) by and through the undersigned attorney, and very respectfully states and prays as follows:

1. In accordance with Rule 10(c) of the Federal Rules of Civil Procedure, a party is allowed to adopt by reference statements and pleadings of any other pleading or motion within a case. Fed. R. Civ. P. 10(c).

2. Codefendant Raymond Bosque-Del Toro filed a *Motion to Dismiss* on March 18th, 2025. *See Docket number 163*.

3. In said pleading, Codefendant Raymond Bosque-Del Toro requested the Honorable Court to dismiss the Complaint for the following reasons: (1) failure to meet Rule 9(b)’s pleading standards for fraud; (2) failure to plead predicate acts of racketeering; (3) lack of standing; (4) failure to establish a pattern of racketeering; and (5) failure to plead that the predicate acts are sufficiently related to establish a “pattern.”; among others. *See Docket number 163*.

4. The appearing Codefendant has reviewed Codefendant Raymond Bosque-Del

Toro's motion to dismiss and wishes to join in and adopt in its *entirety* the contents of said motion, as they relate identically to Stefania Vélez Echevarría.

5. The appearing party hereby adopts by reference and joins Raymond Bosque-Del Toro statements and pleadings on his *Motion to Dismiss*, insofar as the allegations relate to the appearing codefendant, Stefania Vélez Echevarría, requesting dismissal of the present claim against codefendant Stefania Vélez Echevarría. *See Docket Number 163*.

WHEREFORE, we respectfully request from this Honorable Court that this motion for joinder be granted and that the Complaint against Stefania Vélez Echevarría be dismissed accordingly.

WE HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification electronically to all counsel of record.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 18th day of March 2025.

s/ Gilberto J. Oliveras Maldonado
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